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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
MDL No. 1917

The Honorable Samuel Conti

This Document Relates to:

Individual Case No. 3:14-cv-02510

*ViewSonic Corporation v. Chunghwa
Picture Tubes, Ltd. et al.*, No. 14-cv-02510

**DECLARATION OF MATTHEW J.
MCBURNEY IN SUPPORT OF PLAINTIFF
VIEWSONIC CORPORATION'S
MEMORANDUM IN OPPOSITION TO
DEFENDANTS' JOINT MOTION FOR
SUMMARY JUDGMENT BASED UPON
FAILURE TO PROVIDE EVIDENCE TO
AVOID FTAIA BAR ON FOREIGN
COMMERCE**

1 I, Matthew J. McBurney, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court, and am a counsel with
3 Crowell & Moring LLP, attorneys of record for Plaintiff ViewSonic Corporation. I make this
4 declaration in support of ViewSonic's Memorandum in Opposition to Defendants' Joint Motion
5 for Summary Judgment Based Upon Failure to Provide Evidence to Avoid FTAIA Bar on
6 Foreign Commerce. I have personal knowledge of the facts set forth herein, except as to those
7 stated on information and belief and, as to those, I am informed and believe them to be true. If
8 called as a witness, I could and would competently testify to the matters stated herein.

9 2. Attached hereto as **Exhibit 1** are true and correct excerpts from the deposition
10 transcript of Bonnie Cheng taken on October 9, 2014.

11 3. Attached hereto as **Exhibit 2** are true and correct excerpts from the deposition
12 transcript of Bodil Chen Kao taken on November 6, 2014.

13 4. Attached hereto as **Exhibit 3** are true and correct excerpts from the deposition
14 transcript of Rose Yang taken on November 7, 2014.

15 5. Attached hereto as **Exhibit 4** are true and correct copies of Exs. 16a and 17 from
16 the Alan Frankel expert report dated June 6, 2014.

17 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by
18 ViewSonic in this litigation, bearing bate numbers VIEW_CRT00002328.

19 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by
20 ViewSonic in this litigation, bearing bates number VIEW_CRT00016574.

21 8. Attached hereto as **Exhibit 7** is a true and correct copy of Exhibit 20b from the
22 Alan Frankel expert report dated June 6, 2014.

23
24 I declare under penalty of perjury that the foregoing is true and correct. Executed this
25 23rd day of December 2014 at Washington, District of Columbia.

26
27 /s/ Matthew J. McBurney
28 Matthew J. McBurney